


Southern California Edison Company

23 PARKER STREET
IRVINE, CALIFORNIA 92718

HAROLD B. RAY
VICE PRESIDENT

November 27, 1989

TELEPHONE
714-458-4400

U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: **Docket Nos. 50-361 and 50-362**
Reply to a Notice of Violation
San Onofre Nuclear Generating Station, Units 2 and 3

In a letter to the undersigned dated October 27, 1989, the NRC forwarded Inspection Report Nos. 50-361/89-24 and 50-362/89-24 and an associated Notice of Violation. In accordance with 10CFR2.201, the enclosure to this letter provides the Southern California Edison (Edison) reply to Violation B in the Notice of Violation. A reply to Violation A was provided in my letter dated November 20, 1989.

In discussing Violation B, the Inspection Report included the following:

"In addition, the licensee was evaluating the operability of the CREACUS (control room emergency air cleanup system) with the condition found by the inspector. Furthermore, the licensee will establish the time required to secure the door for the CREACUS to be considered operable. This evaluation was scheduled to be completed on or about September 15, 1989."

On September 18, 1989, Edison reviewed with NRC resident inspector staff evaluations of the effect on control room habitability of the condition found by the inspector. Separate toxic gas and radiological evaluations were performed, and they concluded that the open condition of the particular door involved did not significantly effect the protection provided by the CREACUS.

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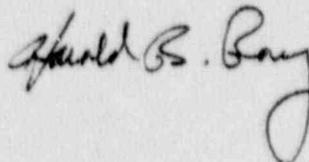
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November 27, 1989

The basis for CREACUS operability described in the Technical Specifications is to limit radiation exposure to personnel occupying the control room to 5 rem or less whole body, or its equivalent, following all credible accident conditions. Conservative procedural requirements, which were not fully met under the condition found by the inspector, have been established by Edison to permit door openings in the CREACUS boundary that may be necessary to permit work to be performed to be closed promptly when required.

If you have any questions or comments, or if you would like additional information, please let me know.

Sincerely,



Enclosure

cc: J. B. Martin, Regional Administrator, NRC Region V
C. W. Caldwell, NRC Senior Resident Inspector, San Onofre

ENCLOSURE
REPLY TO A NOTICE OF VIOLATION

VIOLATION B

Appendix A to Mr. Chaffee's letter, dated October 27, 1989, states in part:

"B. Technical Specification 6.8.1 requires that applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February, 1978 be established and implemented.

"Appendix A of Regulatory Guide 1.33, Section 9, 'Procedure for Performing Maintenance,' states that 'Maintenance that can affect the performance of safety-related equipment should be properly preplanned and performed in accordance with written procedures, documented instructions, or drawings appropriate to the circumstances.'

"Attachment 6 to procedure SO123-I-1.7, 'Maintenance Order Preparation, Use and Scheduling (TCN 2-4)', states that:

'Work activities that require any obstruction to pass through a Control Room Boundary Doorway must be accurately described in the work documents as being a breach of Control Room CREACUS (control room emergency air cleanup system) boundaries. The work organization must ensure that any obstructions through the boundary doors, such as hoses, cables, etc., will have a quick disconnect device in the near vicinity of the breached doorway. The Maintenance Order will specify that personnel will be prepared to remove the obstruction and close the door when notified.'

For cases where a work organization has an obstruction through a Control Room Boundary doorway, it will have an individual continuously stationed at the door ready to react to directions from Security or Operations personnel to remove the obstruction and close the door as directed.'

"Contrary to the above, on August 15, 1989, CREACUS door AC236 was tied open with five temporary power cables installed through the door opening. These cables did not have quick disconnect devices installed and no one was stationed at the doorway.

"This is a Severity Level IV violation (Supplement I), applicable to Units 2 and 3."

RESPONSE TO VIOLATION B

1. Reasons for the violation.

Edison admits that on August 15, 1989, CREACUS door AC236 was tied open to permit the passage of temporary power cables that did not have quick disconnect devices, that no one was stationed at the doorway to remove the cables and close the door, if required, and that this was contrary to procedures.

During the planning phase for the maintenance order covering the installation of the temporary power cables, the maintenance planner performed a walkdown of the equipment location to familiarize himself with the nature of the work to be performed. However, the planner failed to identify door AC236 as part of the CREACUS boundary during this walkdown. Because of this failure, the CREACUS precautions specified in procedure SO123-I-1.7 were not included in the maintenance order.

When the work authorization was prepared for this maintenance order by Operations, it was not recognized by Operations personnel that the door was a CREACUS boundary. Subsequent physical observation of the door by operators also failed to identify this door as a CREACUS boundary. A sign is provided on door AC236 identifying it as a CREACUS boundary, however, Edison concluded that the existing sign did not adequately identify the CREACUS function of the door.

2. Corrective steps that have been taken and the results achieved.

On August 15, 1989, the temporary cables passing through doorway AC236 were removed. The maintenance order was revised and reissued on August 21, 1989, to incorporate CREACUS boundary requirements.

The planner involved in the preparation of the maintenance order was counseled regarding the need to perform thorough plant walkdowns.

To augment the guidance contained in procedure SO123-I-1.7, Maintenance Procedure SO123-I.1.36, "Cables - Installation of Temporary Cables," was revised on September 11, 1989, to add the requirement for the use of quick disconnect devices on cables breaching opened CREACUS doors.

A mandatory reading assignment to all Unit 2/3 operators addressing this occurrence was completed on October 6, 1989.

3. Corrective steps that will be taken to avoid further violations.

New CREACUS signs, having a more distinctive physical appearance, will be installed on appropriate doors to better identify their CREACUS function. These signs will be installed by December 15, 1989.

The Maintenance Incident Investigation Report addressing this occurrence has been included in the Maintenance Division's required reading program for completion by November 30, 1989.

A new job performance measure will be added to the licensed operator training program to emphasize the importance of CREACUS (as well as the Toxic Gas Isolation System and the Control Room Isolation System). This addition will be completed by March 30, 1990.

The San Onofre Maintenance Management System (SOMMS) will be examined to determine the feasibility of using SOMMS to automatically identify CREACUS-related components as a part of maintenance order preparation. This feasibility review will be completed by March 30, 1990.

4. Date when full compliance will be achieved.

Full compliance was achieved on August 15, 1989, when the cables through doorway AC236 were removed.